

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 19-md-02913-WHO

**STIPULATION AND [PROPOSED] ORDER
TO AMEND DEADLINE AND FORMAT RE:
PROPOSED LIMITING INSTRUCTIONS**

This Document Relates to:

Bain v. JUUL Labs, Inc., et al.

The parties jointly stipulate and agree, subject to the Court's approval, to amend the deadline and format for the submission of the proposed limiting instructions required by the Court's May 9, 2022 Civil Minutes (Doc. 3170).

WHEREAS, the parties submitted Joint and Contested Proposed Jury Instructions, including legal authority for contested instructions, as Exhibit A to the Joint Pretrial Conference Statement (Doc. 3062-1);

WHEREAS, the Court held the pretrial conference for the *Bain* trial on May 9, 2022;

WHEREAS, following the pretrial conference, the Court issued civil minutes requiring the parties to meet and confer on certain jury instructions, and to outline remaining disputes in joint letters of specified length, with submissions due on June 2, 2022;

WHEREAS, on May 26, 2022, the Court adjourned the *Bain* trial to September;

1 WHEREAS, a short extension of time will permit the parties to meet and confer and
2 exchange authority on the jury instructions at issue; and

3 WHEREAS, including briefing in the combined jury instruction document rather than in
4 separate letter briefs will make the submission most readable,

5 The parties stipulate that the revised instructions and briefing on any disputes be
6 submitted by June 9, 2022.

7 The parties further stipulate that briefing on any disputes be submitted in the same format
8 the parties used when submitting the Joint and Contested Proposed Jury Instructions (i.e., each
9 party's positions to follow any contested instructions). Any briefing will be consistent with the
10 page limitations established in the Civil Minutes.

11 The parties respectfully request that the Court enter an Order establishing the above
12 deadline and formatting specification.

13 Dated: May 31, 2022

Respectfully submitted,

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Case No. 19-md-02913-WHO

**[PROPOSED] ORDER TO AMEND
DEADLINES RE: DEPOSITION
DESIGNATIONS EXCHANGE**

This Document Relates to:

Bain v. JUUL Labs, Inc., et al.

The Court hereby adopts the Parties' stipulations regarding the deadline and format for the submission of the limiting instructions identified in the May 29, 2022 Civil Minutes.

The Court ORDERS that the parties' submission on the jury instructions identified in the May 9, 2022 Civil Minutes is due on June 9, 2022.

The Court further ORDERS that the parties may submit briefing on any disputes in the same format as the parties used when submitting the Joint and Contested Proposed Jury Instructions filed as Exhibit A to the Joint Pretrial Conference Statement.

Date: _____, 2022

HONORABLE WILLIAM H. ORRICK
United States District Judge